



The Hon. Sylvia O. Hinds-Radix
Corporation Counsel

THE CITY OF NEW YORK
LAW
DEPARTMENT
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NEW YORK, NY 10007

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September 21, 2023

VIA ECF

Hon. John G. Koeltl
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007

APPLICATION GRANTED
SO ORDERED

[Signature]
9/22/23 John G. Koeltl, U.S.D.J.

Re: *G.R. v. N.Y.C. Dep't of Education*, 23-cv-3948 (JGK)(KHP)

Dear Judge Koeltl:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to respectfully request a 10-day extension of (a) the filing of the Rule 26(f) report, from September 26, 2023 to October 6, 2023 and (b) a 10-day adjournment of the initial phone conference, from October 10, 2023 to October 20, 2023. Plaintiff consents to these requests. This is the first request to extend the filing deadline of the Rule 26(f) report as well as the first request to adjourn the initial conference. The requested extensions will give the parties additional time to negotiate settlement. The parties are hopeful that they can settle this matter without further burden on the Court's time.

Accordingly, Defendant requests that the Rule 26(f) report deadline be extended to October 6, 2023 and the initial phone conference be adjourned to October 10, 2023.

Thank you for considering these requests.

Respectfully submitted,

/s/

Martha Nimmer
Special Assistant Corporation Counsel

cc: Kevin Mendillo, Esq. (via ECF)